

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

U.S. DISTRICT COURT  
EASTERN DISTRICT-WI  
FILED

2021 SEP 14 PM 2:31

UNITED STATES OF AMERICA,

Plaintiff,

[SEALED]

CLERK OF COURT

v.

Case No. 21-CR-

21-CR-193

[21 U.S.C. §§ 841(a)(1), (b)(1)(B),  
and 846, 18 U.S.C. § 2(a)]

KAMAAL L. OWEN,  
PATRICK KIM, and  
JOHN C. GONZALEZ,

Defendants.

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INDICTMENT

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**THE GRAND JURY CHARGES THAT:**

1. From at least January 2015, and continuing until July 17, 2018, in the State and Eastern District of Wisconsin and elsewhere,

**KAMAAL L. OWEN,  
PATRICK KIM, and  
JOHN C. GONZALEZ**

knowingly and intentionally conspired with each other, and with persons known and unknown to the grand jury, to possess with the intent to distribute and to distribute a mixture and substance containing a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

2. The amount involved in the conspiracy attributable to each defendant as a result of his own conduct, and the reasonably foreseeable conduct of other conspirators, is 100 kilograms or more of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(B), and Title 18, United States Code, Section 2(a).

**FORFEITURE NOTICE**

1. Upon conviction of the controlled offense in violation of Title 21, United States Code, Sections 841 and 846, set forth in this Indictment, the defendants shall forfeit to the United States of America, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the offense of conviction, as well as any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense of conviction, including but not limited to, the following:

- a. A sum of money representing the amount of proceeds obtained as a result of the offense.

2. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to Title 18, United States Code, Section 982(b)(1) and Title 21, United States Code, Section 853(p).

A TRUE BILL. [REDACTED]

FOREPERSON

Dated: Sept. 14, 2021

  
RICHARD G. FROHLING  
Acting United States Attorney